

**Joseph & Norinsberg LLC**

---

Fighting for Employee Justice



**Downtown Manhattan Office**  
One World Trade Center, 85th Floor  
New York, NY 10007

**Midtown Manhattan Office**  
110 East 59th Street, Suite 2300  
New York, New York 10022

**Newark Office**  
One Gateway Center, Suite 2600  
Newark, New Jersey 07102

**Philadelphia Office**  
1650 Market Street, Suite 3600  
Philadelphia, Pennsylvania 19103

**Boston Office**  
225 Franklin Street, 26th Floor  
Boston, Massachusetts 02110

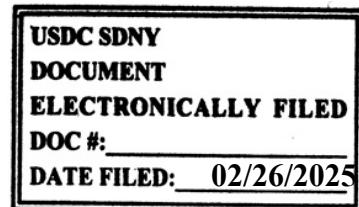
**Orlando Office**  
300 N. New York Ave, Suite 832  
Winter Park, Florida 32790

**Arjeta Albani, Esq.**  
[arjeta@employeejustice.com](mailto:arjeta@employeejustice.com)

February 26, 2025

**VIA ECF**

Hon. Katharine H. Parker  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 17D  
New York, N.Y. 10007-1312



**MEMO ENDORSED**

Re: ***Turner v. The Weed Shoppe, Inc.***  
***Case No. 1:24-cv-07995 (DEH) (KHP)***

Dear Judge Parker:

We represent Plaintiff Tavon Turner ("Plaintiff") in the above-referenced matter, filed under the Americans with Disabilities Act ("ADA"), 42 U.S.C. § 12101 et seq., against Defendant The Weed Shoppe, Inc. ("Defendant") (collectively, the "Parties"). We respectfully submit this letter to request an adjournment of the Initial Pre-Trial Conference currently scheduled for February 27, 2025, at 2:00 p.m.

Counsel for Defendant reached out to our office today advising that they were just retained. During that call we were also able to discuss potential settlement of this matter and have made significant headway toward resolution. Given the nature of the discussions today, we believe that settlement is likely, and we would respectfully request an adjournment of the conference for thirty (30) days to allow the parties to continue settlement negotiations.

Thank you for your time and consideration.

Sincerely,

Arjeta Albani, Esq.

Attorney for Plaintiff  
110 East 59th Street, Suite 2300  
New York, New York 10022  
Tel. No.: Tel: (212) 791-5396  
Fax No.: (212) 406-6890  
[Arjeta@employeejustice.com](mailto:Arjeta@employeejustice.com)

c.c. Jeffrey S. Ehrlich P.C.  
[jehrlichlaw@gmail.com](mailto:jehrlichlaw@gmail.com)

**APPLICATION GRANTED: The Initial Conference set for Thursday, February 27, 2025 at 2:00 p.m. in Courtroom 17D, 500 Pearl Street, New York, NY 10007 is hereby rescheduled to Wednesday, April 9, 2025 at 12:30 p.m.**  
**The Plaintiff is directed to serve a copy of this endorsement on the Defendant.**

**APPLICATION GRANTED**

Katharine H. Parker

**Hon. Katharine H. Parker, U.S.M.J.**

02/26/2025